

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	No. 19 CR 567
)	
-vs-)	
)	Hon. Harry D. Leinenweber
)	
ROBERT SYLVESTER KELLY, also known)	
As "R.Kelly," DERREL MCDAVID, and)	
MILTON BROWN, also known as "June)	
Brown.")	
)	
Defendants.)	

MOTION FOR EXTENSION OF TIME TO FILE POST TRIAL MOTIONS

NOW COMES, Defendant, ROBERT S. KELLY, by and through his counsel, the Bonjean Law Group, PLLC and moves this Court for a two-week extension of time until November 15, 2022, to file his post-trial motions.

1. After a month-long trial, a jury found Defendant Kelly guilty as to Counts I, II, III, IX, X, XII of the indictment and not guilty as to Counts IV, V, VI, VII, VII, XI, and VIII of the indictment on September 14, 2022.

2. Post-trial motions are presently due on November 1, 2022, with responses due on November 15, 2022.

3. For the reasons set forth herein, counsel for Kelly is seeking a two-week extension of time to file his post-trial motions.

4. Over the last few months, Defendant Kelly's counsel has done their utmost to manage an extraordinarily demanding trial schedule and several pressing deadlines. As this court may recall, prior to trial in the present matter, counsel for Kelly was on trial from May 23, 2022,

through June 22, 2022, in the Superior Court of Los Angeles in the matter of *Huth v. Cosby*, No. BC 565560. The back-to-back trial schedule for Bonjean Law Group's boutique law firm created a significant backlog of work for which counsel is still trying to catch up.

5. During the *Kelly* trial alone, Bonjean Law Group filed two opening briefs in the Illinois appellate court in *People v. Rodriguez*, 1-21-0907 and *People v. Blue*, 5-22-0177 as well as post-trial motions in the *Huth* matter. Our firm also filed a brief in United States Court of Appeals for the Sixth Circuit in *USA v. Baker*, 2022-cr-05067 on September 30, 2022.

6. In addition to these briefs, since the conclusion of the instant trial, our firm had a restitution hearing in *People v. Kelly*, 19-cr-286 on September 28, 2022, which involved extensive briefing, plaintiff's deposition in *Ochoa v. Lopez*, 20-cv-02977 on October 14, 2022, two depositions in the matter of *Maysonet v. Guevara*, 18-cv-02342 on October 17 and 18, 2022 and a reliability hearing in a criminal matter on October 20, 2022, in *People v. Bryant*, 13CR11571.

7. Furthermore, counsel has a petition for rehearing due today in *Williams v. Kelly*, 2022-L-008991, a final pretrial order due in *Allen v. Leonard, et. al.*, 18-cv-07163 on November 11, 2022, and an impending expert discovery deadline in *Maysonet v. Guevara*, 18-cv-02342 on November 4, 2022. These are just a few imminent deadlines and do not include several other depositions and hearings over the next few weeks.

8. Finally, and significantly, yesterday, the government produced a letter to counsel for Kelly related to Dr. Darrell Turner's testimony at trial which requires additional research and may warrant an additional motion that was not previously contemplated.

9. The government has no objection to this request and requests until December 6, 2022 to file their response to our motions.

10. For the foregoing reasons, undersigned counsel respectfully requests until November 15, 2022, to file post-trial motions.

Respectfully Submitted,

/s/ASHLEY COHEN

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